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July 27, 2022

Hon. Margo K. Brodie
United State District Judge for the Eastern
District of New York
225 Cadman Plaza East
Brooklyn, New York 11202

Re: Julie Goggin, et al. v. JetBlue Airways Corporation

Case No. 20-cv-6188 (MKB)

Dear Judge Brodie:

We represent defendant JetBlue Airways Corporation in the captioned matter. On June 8, 2022, the Court adopted the parties' second proposed briefing schedule for JetBlue's anticipated motion for summary judgment. Under that schedule, JetBlue was to serve its motion on or before August 5, 2022, plaintiff to serve her opposition on or before September 16, 2022, and JetBlue to serve its reply on or before September 30, 2022.

On Monday, July 25, 2022, my wife was admitted to Cedars-Sinai Hospital, through the emergency room, with significant difficulties with balance and walking, and some cognitive issues. She is currently a patient at Cedars, and I have spent the past three days at the hospital unable to do any work on the motion or on anything else. Although we hope she will be released soon, it is difficult to say what attention she will need from me in the next few weeks. Consequently, it will be extremely difficult, if not impossible, for me to adequately prepare JetBlue's motion under the current schedule.

For the above reason, plaintiff's counsel and I have met and conferred, and he has graciously agreed to a further extension on the briefing schedule for JetBlue's motion. We respectfully request that the Court approve the following modification to the existing briefing schedule for JetBlue's motion for summary judgment.

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Defendant's Opening Brief: September 20, 2022

Plaintiff's Opposition Brief: November 1, 2022

Defendant's Reply Brief: November 15, 2022

This request is not intended to delay this action or to inconvenience the Court. The parties look forward to hearing from the Court regarding their joint request for this modification to the briefing schedule.

Respectfully submitted,

Arthur I. Willner

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Counsel for Defendant

JetBlue Airways Corporation